

Heat in Buildings Strategy

Child Rights and Wellbeing Impact Assessment Summary

November 2021



Scottish Government
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CRWIA title: The Heat in Buildings Strategy

Summary of policy aims and desired outcomes

This final Heat in Buildings Strategy sets out a pathway to zero emissions buildings by 2045 and details a series of near-term actions to put us on a clear path towards this, as well as a range of further, longer-term commitments to accelerate the transformation of the nation's building stock. It sets out the principles we will apply to ensure our action to decarbonise heat does not have a detrimental impact on fuel poverty rates.

The Strategy sets out a vision for over 1 million homes in Scotland to convert to zero emissions heating by 2030 and the equivalent of 50,000 non-domestic buildings. Emissions from heat in buildings will have to fall by 68% by 2030 as compared to 2020. To maintain progress towards our statutory emissions reduction targets, heating installations must scale up to provide at least 124,000 systems installed between 2021 and 2026. The installation rate will need to peak at over 200,000 new systems per annum in the late 2020s, which is above the natural replacement rate for boilers.

In terms of energy efficiency, the Strategy sets out that where technically and legally feasible and cost-effective, by 2030 a large majority of buildings should achieve a good level of energy efficiency, which for homes is at least equivalent to an EPC Band C, with all homes meeting at least this standard by 2033.

As well as providing an update to the 2018 Energy Efficient Scotland Route Map, the Strategy is aligned with wider Scottish Government policy on housing, energy, and climate change. The actions it sets out are reflected in our Housing to 2040 Strategy, which also presents further details on how Scotland's housing can support achievement of our net zero ambitions, whilst also delivering against wider objectives.

We envisage that the delivery of our Heat in Buildings Strategy will secure a wider set of outcomes that will benefit Scotland's people and places. These outcomes, aligned with our National Performance Framework, will guide our decision making and support the development of a holistic, people-centred approach to the transition ahead:

1. Heating our homes and buildings no longer contributes to climate change
2. The cost of heating our homes and businesses is affordable and those occupying them have a high comfort level
3. We have reduced our demand for heat, and poor energy efficiency is no longer a driver of fuel poverty
4. The systems we use are smart and resilient and provide us with a reliable source of heat
5. We have a secure supply chain with high value local sustainable jobs across Scotland and people have been helped to transition to new, secure jobs as part of a just transition
6. Our indoor and outdoor spaces are filled with cleaner air
7. Our heating systems enable and efficiently use Scotland's renewable energy resources

8. Electricity and non-electrical fuels are produced from sustainable sources in a way which is consistent with net zero emissions and biodiversity targets
9. Our heating systems enable the flexible and stable operation of our energy networks

A public consultation on the Draft Heat in Buildings Strategy commenced in February 2021 and received 178 responses, providing a valuable resource to support ongoing policy development.

The publication of the Heat in Buildings Strategy is only the first step. As we roll out its actions, we will continue to build the evidence base and apply that knowledge to our policy design and to our programmes, mitigating risks of unintended consequences, tracking progress, and learning by doing in order to adjust immediately where unintended consequences nevertheless arise

The Heat in Buildings Strategy forms the foundation of our ongoing work, which will build on the insight and evidence generated by the consultation on the draft Strategy and wider input. Our next steps include:

- We have committed to publish a refreshed Energy Strategy and an Energy Just Transition Plan in Spring 2022. This will allow us to further refine our approach to heat in buildings, ensuring a coherent whole-system view and further embedding our evolving policies within our wider approach to delivering a just transition.
- We will set out our approach to eradicating fuel poverty in the Fuel Poverty Strategy by the end of 2021.
- We will develop a bespoke Public Engagement Strategy for heat in buildings.
- We will develop our approach to heat in islands and remote rural contexts in our forthcoming Islands Energy Strategy in 2022 (which will complement the existing National Islands Plan).
- We will co-produce with the sector a Supply Chain Delivery Plan focussed on the development of energy efficiency and zero emissions heat in the buildings supply chain in Scotland.
- We will establish a Green Heat Finance Taskforce by the end of this year.

Executive summary

This Child Rights and Wellbeing Impact Assessment (CWRIA) has considered the potential impacts of the Heat in Buildings Strategy on children and young people.

This CRWIA highlights critical issues for Child Rights and Wellbeing that will be considered throughout the development of forthcoming actions set out in the Strategy, both through the mitigations proposed here and in gathering further detail and information. Additional CRWIAs will be conducted for specific policies and programmes including the development of regulation.

We will continue to consult with a wide range of stakeholders, including those that represent children and young people as the Heat in Buildings programme is delivered.

Utilising a range of evidence sources, and by considering both wellbeing indicators and United Nations Convention on the Rights of the Child (UNCRC) articles, we have concluded that the Heat in Buildings Strategy complies with the UNCRC. There will be an overall positive impact on children and young people if the Strategy is successful in achieving its goals. Any potential negative impacts identified are expected to be short term and mitigations are identified here which will be carried out as the Strategy is implemented.

The assessment considers articles 23,24,27,29 and 32.

Background

Following the passage of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, Scotland has set a statutory target for net zero greenhouse gas emissions by 2045, with interim emissions reductions of 75% (by 2030) and 90% (by 2040).

This move follows the First Minister's recognition of a global climate emergency. In response, the Scottish Government set out the initial action it would take, as part of the Programme for Government 2019-2020.

The Scottish Government committed to publishing a Heat Decarbonisation Policy Statement in the summer of 2020 but due to the ongoing Covid-19 pandemic this was delayed until the winter of 2020/21.

Scottish Ministers then took the action to merge the Heat Decarbonisation Policy Statement with an update to the 2018 Scottish Energy Efficiency Route Map creating the Heat in Buildings Strategy, a single overarching policy framework for the elimination of emissions from heating our homes and buildings by 2045 as well as removing poor energy efficiency as a driver of fuel poverty in line with our statutory fuel poverty targets.

Scope of the CRWIA

A CRWIA is required to establish the impact of the Heat in Buildings Strategy on children and young people.

Groups of children and young people affected by the Heat in buildings Strategy

The Heat in Buildings Strategy is not directly aimed at children or young people, but is aimed at the homes and buildings they live in and visit. Although the Strategy will have an indirect impact on all children and young people under 18 including non-documented and non-citizen children, through the actions to improve

energy efficiency and drive forward zero emissions heating, the following groups of children are likely to be at risk of increased impact:

- Children with enhanced heating needs such as those with a disability or illness or babies and very young children.
- Children in families of the six child poverty priority family types most at risk of poverty.
- Children in families in or at risk of fuel poverty.
- Children living in care.

The evidence base

Evidence was gathered from a number of sources:

- UN Children's Climate Risk Index (2021)
- Fuel Poverty Strategy Child Rights and Wellbeing Impact Assessment (2018)
- Child Rights and Wellbeing Impact Assessment workshop (2021)
- Social research project on the likely equality implications of heat decarbonisation in buildings for consumers in Scotland (2021)
- Heat in Buildings Strategy (draft) consultation responses (2021)
- Family Resources Survey (annual publication)
- Scottish Household Survey (annual publication)

The evidence highlighted a number of key issues:

Children with a disability

Access and disruption

Households with a disabled child are likely to be impacted by high installation costs and/or increases in fuel bills due to low financial resilience. These households could also be subject to greater disruption in homes when carrying out work to install new measures. Their homes may have already been adapted to address the needs of the family and there is an additional need to make sure that changes do not negatively affect access, space or the layout of the home. Furthermore, disabled people and families often live in the poorest quality houses and have additional needs that require support throughout the retrofit process. This can make it more expensive for scheme providers and installers to reach these households and treat their homes. Incentives to deliver targets at least cost have resulted in these households being side lined for support.

Potential for increased costs

Poverty rates for households with a disabled member are higher than households with no disabled members, and households have below average wealth and increased living costs, and are less likely to be in work. Additionally, households with a disabled member are likely to have higher heating and have additional needs in the retrofit process to protect space, layout and accessibility which can increase the cost of installation.

Children's health

Air quality

Improving the energy efficiency of housing can create warmer and therefore healthier indoor living environments with improved thermal comfort, humidity levels and air quality. Health improvements through energy efficiency measures have also been shown to have wider social impacts on children where interventions to improved heating and energy efficiency in homes found that there was a significant reduction in respiratory systems and was linked to a reduction of days missed from school. However, caution is required around the unintended consequences of retrofitting where a lack of ventilation caused negative implications for health and indoor air pollution.

Costs

The running costs for zero emissions heat systems depend on a variety of factors, including how well insulated and how large the building is, the efficiency of the heating system, and the price of energy offered by the supplier. Heat pumps are a key zero emissions technology, and a very efficient way of using electricity to provide heat. Although one kWh of electricity is currently more expensive than one kWh of gas (by a factor of about 4-5), the higher efficiency of a heat pump means the amount of energy needed can be less than a third the amount of energy needed by a gas boiler to produce an equivalent amount of heat. This means that for some properties, heat pumps can help reduce bills where they are replacing older, more inefficient oil and gas heating systems, or where they are combined with upgrades to the efficiency of the building's fabric. Increasingly there is also the option to deploy heat pumps alongside other measures such as solar PV or battery storage to help further reduce electricity bills. However, when a heat pump replaces a modern, efficient gas boiler, the greater efficiency of the heat pump may be insufficient to offset the higher price of electricity and the household's running costs may therefore increase. This impact may be felt further with households with young or disabled children who have enhanced heating hours and temperature needs.

Poverty

Child poverty

Around one in four children in Scotland are also living in poverty. Reducing household costs is one of the three drivers of child poverty reduction. The other two being increasing incomes from work and earnings and maximising incomes from social security and benefits in kind. The Scottish Government's ambition to eradicate child poverty is set in statute through the Child Poverty (Scotland) Act 2017. The headline measure is to reduce relative child poverty from around 24% (240,000 children) today to fewer than 10% (100,000) children by 2030-31, with an interim target of 18% (180,000 children) to be met by 2023-24. Ninety percent of children in poverty live in the one of six priority family types - lone parent families, families with a parent or child with a disability, minority ethnic families, families with a child under 1, larger families (3+ children) and families with a mother under 25. We will publish our second Tackling Child Poverty Delivery Plan in March 2022.

Fuel Poverty

According to the Scottish House Condition Survey (SHCS), on average over the period 2017-19, there are around 98,000 households with children under 16 living in fuel poverty (or 16% of all fuel poor households). This is equivalent to around 170,000 children living in fuel poverty. Poor energy performance is one of the drivers of fuel poverty, the others being low income and high fuel prices.

Skills and education

The heat transition presents a positive opportunity for young people, as the demand grows for skills in this area. Through our consultation process, stakeholders spoke about the importance of ensuring apprenticeships offered to young people in the sector are done in a fair and safe way and do not result in child exploitation.

Climate Change

As noted in 'The Climate Crisis is a Child Rights Crisis: Introducing the Children's Climate Risk Index', children in the UK have medium to high-risk exposure to climate change.

Children and young people's views and experiences

No children or young adults directly responded to the on-line consultation or CRWIA workshop. However, through our refreshed Governance process we will continue to consult with a wide range of stakeholders, ensuring that we include those that represent children and young people.

We have taken a high-level approach to the CRWIA that accompanies the Strategy, highlighting critical issues that subsequent impact assessments will elaborate on as policy, programmes and regulations develop.

Key Findings, including an assessment of the impact on children's rights, and how the measure will contribute to children's wellbeing

The Heat in Buildings Strategy is not directly aimed at children or young people, but is aimed at the homes they live in and buildings they visit. It is anticipated that in the long term the Strategy will impact positively on the rights and wellbeing of children and young people.

Assessment of the impact on Children's rights.

The Heat in Buildings Strategy recognises all four of the general principles which underpins the UNCRC: Article 2 - non-discrimination; Article 3 - best interests of the child; Article 6 – the right to life, survival and development; and Article 12 – respect for the views of the child.

Overall assessment

This assessment will inform Scottish Ministers' reporting to Parliament on children's rights under the Children and Young People (Scotland) Act 2014.

By considering both wellbeing indicators and UNCRC articles, we have concluded that the Heat in Buildings Strategy complies with the UNCRC. There will be an overall positive impact on children and young people if the Strategy is successful in achieving its goals.

Climate change is a priority for this government and in the long term, it is evident that our children have the most to lose if actions are not taken to tackle this climate emergency. Any potential negative impacts identified are expected to be short term and mitigations will be put in place as the Strategy is implemented.

In taking forward the actions in this Strategy we will commit to ensuring that our Heat in Buildings delivery programmes consider steps that might further promote and protect the rights of children and young people, consistent with the requirements of the UNCRC. Specific issues are detailed below.

Specifically the Strategy is relevant to the following Articles of the UNCRC:

Article 23 Children with a disability

A child with a disability has the right to live a full and decent life with dignity and, as far as possible, independence and to play an active part in the community. Governments must do all they can to support disabled children and their families.

Households with disabled children may experience greater disruption in homes when carrying out work to install measures. Homes may have already been adapted to address the access, space and layout needs of the family. As a result costs of installation may be higher.

Mitigating action:

Quality assurance and skills

- We will work to ensure that all Heat in Buildings delivery programmes do not unfairly disadvantage households with disabled children and where possible, seek to minimise any negative impact on access, space or layout requirements of the home. This will be achieved through the adoption of a whole house retrofit approach based on the PAS 2035/30 standards which includes pre install inspections that cover access requirements such as disability requirements.

Costs and delivery

- We will consider the additional costs that may be incurred to meet the additional needs of disabled families through our Heat in Buildings delivery programmes.

Article 24 Health and health services

All children have a right to the highest attainable standard of health, and to health care services that help them to attain this. Governments must provide good quality health care, clean water, nutritious food and a clean environment so that children can stay healthy.

There are a number of positive health impacts that actions from the Strategy may provide for children and young people. For example, a shift away from fossil fuel boilers may be safer for children in the home as this removes combustion and therefore the risk of carbon monoxide poisoning. Efforts to improve energy efficiency and heating in buildings could positively impact on infant physical development, long-term physical and mental health and education (with less missed days at school due to illness). Moving towards zero emissions heating technologies such as heat pumps can also provide a more constant heating regime for a home or building due to the operational requirements of a heat pump. This may also benefit occupants such as children by providing more consistent levels of comfort.

However, if a property is not kept well ventilated through construction, technological or natural means, energy efficiency measures which improves airtightness, can lead to increased indoor air pollutants; risk of overheating in the summer months and rise in humidity, which can result in increased dust mites and mould impacting respiratory conditions and allergies. Children can be particularly vulnerable to these, especially if they have existing health problems.

Mitigating action:

Ventilation

- The Strategy recognises that it will be important to understand the need for passive measures, such as ventilation and shading, that could be applied to buildings during the course of improving their fabric efficiency. It will also be important to understand the need for, and role of, zero emissions heat systems that are capable of also providing cooling, such as reversible heat pumps.

Quality Assurance and skills standards

- We will adopt a whole house approach based upon the PAS 2035/30 standards as part of our Heat in Buildings delivery programmes.
- We will consider using the UK Government endorsed TrustMark quality assurance framework.
- We will continue to ensure that microgeneration measures supported through our programmes are carried out by an MCS certified installer.

Buildings Standards

- In parallel with development of the New Build Heat Standard, we are reviewing energy standards set through building regulations, to deliver further improvements in building energy performance. This will include very high levels of building fabric performance in our new homes, avoiding the

need for costly retrofit in the future, contributing towards removing poor energy efficiency as a driver of fuel poverty, and making homes more affordable to heat.

Zero Emissions Heat Standard

- The Strategy proposes a new all-tenure zero emissions heat standard, as well as minimum energy efficiency standards for private-rented, owner-occupier and social housing. We will also develop a bespoke approach to regulating for improvements in mixed-tenure and mixed-use buildings.

Article 27 Adequate standard of living

Every child has a right to a standard of living adequate to their physical, mental and social development. Governments should take measures to assist parents and carers who cannot afford to provide this, and in particular to provide assistance and support with food, clothing and housing.

Increased costs

Around one in four children in Scotland are also living in poverty. Reducing household costs is one of the three drivers of child poverty reduction. The other two being increasing incomes from work and earnings and maximising incomes from social security and benefits in kind. The Strategy recognises that some zero emissions heating systems may cost more to install and operate than fossil fuel incumbent systems. Families with children who have a disabled household member may be particularly sensitive to increased costs, as well as those with enhanced heating needs such as those with babies and very young children. Further, families with children who live in rented properties could be at risk of increased costs if landlords could increase the cost of rent as a result of zero emissions installation. Increasing costs for families with low financial resilience is likely to create a negative impact.

Mitigating actions:

Energy efficiency

- High standards of energy efficiency are essential to reduce the overall demand for energy. Alongside energy saving behaviours these measures can help to ensure running costs remain affordable. We will continue to take a fabric first approach as it underpins the successful roll out of low and zero emissions heating, as well as being an important aspect of tackling fuel poverty.

Guiding principles

- We have published in the Strategy a set of guiding principles to underpin our commitment that no one is left behind in the heat transition, ensuring we only take forward actions where they are found to have no detrimental impact on fuel poverty rates, unless additional mitigating measures can also be put in place.

Investment and programme delivery

- We are taking action through our delivery programmes to maximise the number of homes with households in fuel poverty achieving a level of energy efficiency equivalent to EPC C by 2030 and EPC B by 2040.
- We will continue delivery of energy efficiency investment to support fuel poor households in order to make homes warmer and easier to heat and to reduce the impact of any increased running costs from zero emissions systems, including recognising the distinct challenges faced by island, rural and remote communities, and seek to improve targeting so that we can reach more households in fuel poverty.
- In support of reducing household costs, we will continue our investment in Area Based Schemes, extending their reach to support higher numbers of households in or at risk of fuel poverty. We will continue to develop Area Based Schemes as a 'whole house' retrofit programme for fuel poor households based upon a 'zero emissions first' approach to improving heating and making more effective use of micro-generation.
- Additionally, we will procure a new, enhanced successor to Warmer Homes Scotland following expiry of the current contract in September 2022, which will provide support for fuel poor households at its heart, and embed increased support for zero emissions heating, adopting a zero emissions first approach which will support the reduction of household costs.
- To support maximising incomes we are calling on the UK Government to review levy funding for the Energy Company Obligation and the Warm Home Discount and work with Scottish Ministers to bring these together to establish a single, flexible Scottish Fuel Poverty scheme in order to maximise benefits.
- We will continue to work with key stakeholders, such as local authorities and energy suppliers, to ensure that vulnerable and fuel poor households in Scotland receive the help they need from these GB schemes.

Consumer support

- We will continue to work with energy retailers to ensure households have access to the right tariffs, that tariffs tailored to zero emissions heating systems are available, and continue to press for customers with pre-payment meters to access similar tariffs to direct debit customers.

Child poverty and fuel poverty

- Evidence suggests that 240,000 children are in child poverty today and 170,000 children are in fuel poverty. We know that 90% of children in poverty live in the one of six priority family types - lone parent families, families with a parent or child with a disability, minority ethnic families, families with a child under 1, larger families (3+ children) and families with a mother under 25.

Evidence

- We continue to build the evidence base on the interactions between our fuel poverty, child poverty and climate commitments, and are applying that knowledge to our policy design and to our programmes, mitigating any risk of unintended consequences, and tracking progress and learning by doing in order to adjust immediately where unintended consequences nevertheless arise.

Article 29 Goals of education

Education must aim to develop every child's personality, talents and abilities to their fullest potential. It must encourage the child's respect for human rights, their origins and identity, for other cultures around the world, and for the natural environment.

There is an opportunity to involve children in the energy transition as part of their education. As we decarbonise school heating systems, children will have the chance to see zero emission heating in practice first hand and gain understanding of its importance to their community and the wider environment.

To meet the demand for new low and zero emissions heating systems, we will need to grow Scotland's skill base in this area. This could impact school leaver children in a positive way, opening up career pathways for those who wish to enter the sector.

Moving to new zero emission heating systems will require adequate consumer education levels to ensure systems operate effectively.

Mitigating actions:

Engagement:

- We will continue to draw advice from stakeholders and advisors through a variety of channels, building on our productive Heat Decarbonisation External Advisory Group. This group will be adapted as part of our revised governance arrangements for the Heat in Buildings Strategy and we will ensure that children and young people are represented in this process.
- We will ensure that challenges and opportunities identified in this assessment are recognised through the development of our Public Engagement Strategy for Heat in Buildings. The forthcoming National Public Energy Agency will provide leadership and coordination to deliver on our heat decarbonisation targets, which will include public engagement across the breadth of society in Scotland to ensure that people are aware of and understand the changes that are necessary, and can access the right support at the right time to meet their needs. The Public Engagement Strategy will provide the framework to guide how the Agency can best achieve this in practice. Further details will be set out in due course.

Opportunities for education:

- We will ensure that we consider the interest of children and young people as we take action to strengthen supply chains needed to deliver energy efficiency and zero emissions heat at the pace and scale needed to meet our targets. This will include:
 - Work with Scottish Renewables and Skills Development Scotland to undertake a Heat in Buildings Workforce Assessment project to build an evidence base in support of the wider skill requirements and opportunities in the heat in buildings transition including the timings of when skills are required, how best to support the transition opportunity from other industries, support training of young people and the provision of local jobs across Scotland, as well as the development of apprenticeships in this area.
 - The development of a Heat in Buildings Supply Chain Delivery Plan by Summer 2022, which will focus on strengthening the broad supply chains needed to deliver energy efficiency and zero emissions heat in buildings at the pace and scale we need. Part of this work will consider the skills and training opportunities for young people.

Support to decarbonise the school building stock:

- The Scottish Government Learning Estate Strategy sets out a range of outcomes we want to see from our investment in school buildings. One of these outcomes is an energy efficiency target that learning environments should be greener and more sustainable, contributing to Scotland's net zero greenhouse gas emissions commitment. Our energy efficiency target for schools replaced or upgraded through the £1 billion Learning Estate Investment Programme (LEIP) is highly ambitious at 67 kWh per square meter, per year. This target is not just ambitious on paper; we will be following up with local authorities to ensure that the targets are achieved in practice, once the schools are in use.

Article 32 child labour

Governments must protect children from economic exploitation and work that is dangerous or might harm their health, development or education. Governments must set a minimum age for children to work and ensure that work conditions are safe and appropriate.

Apprenticeships offered to young people in the sector have the potential to result in child exploitation if not done so in a fair and safe way. To support mitigating any negative consequences we will:

- continue to use our government led programmes, such as Warmer Homes Scotland, to support apprenticeships;
- introduce Fair Work standards as a condition to our Heat in Buildings delivery contracts.

Assessment of children's wellbeing

The following children's wellbeing indicators will be enhanced as a result of the Heat in Buildings Strategy: Safe, healthy, achieving and responsible.

Safe: Protected from abuse, neglect and harm by others at home, at school and in the community.

Removal of fossil fuel from homes and buildings will result in a safer environment for children with risk removed from combustion of fossil fuel boilers and therefore the risk of carbon monoxide poisoning.

Healthy: Having the highest attainable standards of physical and mental health, access to suitable healthcare, and support in learning to make healthy and safe choices.

A shift away from fossil fuels can bring greater air quality. Energy efficiency improvements to people's homes will lead to an overall reduction in fuel poverty rates and improved living conditions, warmer homes and a better quality of life. This will bring about a positive impact on their health and wellbeing.

Achieving: Being supported and guided in their learning and in the development of their skills, confidence and self-esteem at home, at school and in the community.

Improved energy efficiency has a positive impact on health and wellbeing and could also lead to improving young people's opportunities for educational attainment.

As we continue to build evidence in support of the wider skill requirements necessary for installing low and zero emissions heating systems in the buildings sector, there will be opportunities to support training of young people and the provision of local jobs across Scotland as well as the development of apprenticeships.

Responsible: Having opportunities and encouragement to play active and responsible roles in their schools and communities and, where necessary, having appropriate guidance and supervision and being involved in decisions that affect them.

Public engagement that will follow the Strategy provides opportunity to educate children in a school and community setting about the climate emergency and the importance of the energy transition.

Monitoring and review

We are currently in the process of developing a refreshed governance structure for the implementation of the Heat in Buildings Strategy which will include an annual review. As part of this process we will ensure that our delivery programmes and projects include child rights and wellbeing indicators.

CRWIA Declaration**Authorisation****Policy lead**

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Date

4 November 2021

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Date

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